

IN THE
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Cause No. 4:21-cr-40048-SMY
vs)	
)	
CARLOS L. HALLIBURTON)	
)	
Defendant.)	

Motion for Leave to Withdraw as Counsel

Comes now counsel, Tory Bernsen, and, at the request of her client, Carlos Halliburton, moves this Court for leave to withdraw as Defendant's counsel and for the appointment of new counsel. In support thereof, counsel states as follows:

1. Undersigned counsel was notified by her client that he no longer wants her to represent him in this matter.
2. Mr. Halliburton has instructed counsel to put this motion to the Court on his behalf.
3. Irreconcilable differences have arisen in the attorney-client relationship, including a breakdown in effective communication, which prohibit counsel from continuing to represent Mr. Halliburton.
4. Counsel and Mr. Halliburton have discussed the irreconcilable differences which have arisen in their relationship and Mr. Halliburton instructed counsel to withdraw as his attorney.
5. Mr. Halliburton intends to ask the Court to appoint him new counsel under the Criminal Justice Act.

6. To the extent the Court seeks further explanation regarding the Defendant's request, defense counsel asks that such proceedings occur ex parte so as to not prejudice Mr. Halliburton.

WHEREFORE, Counsel respectfully requests that she be granted leave to withdraw as counsel and that the defendant be appointed new counsel under the Criminal Justice Act.

Respectfully submitted,

MUHLENKAMP & BERNSEN,
ATTORNEYS AT LAW, LLC

By: /s/ Tory D. Bernsen
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CERTIFICATE OF SERVICE

I hereby certify that on September 21, 2023, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all parties of record.

/s/ Tory D. Bernsen